

# ELLIS:LAWHORNE

John J. Pringle, Jr.  
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July 17, 2006

## VIA ELECTRONIC MAIL SERVICE AND HAND-DELIVERY

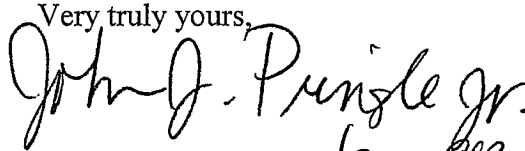
M. John Bowen, Esquire  
Margaret Fox, Esquire  
**McNair Law Firm, PA**  
1301 Gervais Street, 11<sup>th</sup> Floor  
Columbia SC 29201

RE: Petition of Charter Fiberlink SC – CCO, LLC for Arbitration with Chesnee Telephone Company, Inc., **Docket No. 2006-137-C**  
Petition of Charter Fiberlink SC – CCO, LLC for Arbitration with West Carolina Rural Telephone Cooperative, **Docket No. 2006-138-C**  
Petition of Charter Fiberlink SC – CCO, LLC for Arbitration with Lockhart Telephone Company, **Docket No. 2006-139-C**  
**ELS File No. 797-11361**

Dear Mr. Bowen and Ms. Fox:

Enclosed is Charter Fiberlink SC – CCO, LLC's First Set of Interrogatories and First Request for Production of Documents to Chesnee Telephone Company, Inc., West Carolina Rural Telephone Cooperative, and Lockhart Telephone Company in the above-referenced dockets.

Very truly yours,

  
John J. Pringle, Jr. *by CR*

### Enclosures

cc: C. Lessie Hammonds, Esquire, Shannon Bower Hudson, Esquire  
Charles A. Hudak, Esquire/Charles Gerkin, Esquire  
Joseph Melchers, Esquire  
The Honorable Charles L. A. Terreni

**THIS DOCUMENT IS AN EXACT DUPLICATE OF THE E-FILED COPY SUBMITTED TO THE COMMISSION IN ACCORDANCE WITH ITS ELECTRONIC FILING INSTRUCTIONS.**

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

In Re:	)	
	)	
Petition of Charter Fiberlink SC – CCO,	)	
LLC for Arbitration of Certain Terms and	)	
Conditions of Proposed Agreement with	)	
Chesnee Telephone Company, Inc.	)	Docket No. 2006-137-C
Concerning Interconnection under the	)	
Communications Act of 1934, as amended	)	
by the Telecommunications Act of 1996	)	

In Re:	)	
	)	
Petition of Charter Fiberlink SC – CCO,	)	
LLC for Arbitration of Certain Terms and	)	
Conditions of Proposed Agreement with	)	
West Carolina Rural Telephone Cooperative	)	Docket No. 2006-138-C
Concerning Interconnection under the	)	
Communications Act of 1934, as amended	)	
by the Telecommunications Act of 1996	)	

In Re:	)	
	)	
Petition of Charter Fiberlink SC – CCO,	)	
LLC for Arbitration of Certain Terms and	)	
Conditions of Proposed Agreement with	)	
Lockhart Telephone Company Concerning	)	Docket No. 2006-139-C
Interconnection under the Communications	)	
Act of 1934, as amended by the	)	
Telecommunications Act of 1996	)	

**CHARTER FIBERLINK SC – CCO, LLC’S FIRST SET OF INTERROGATORIES  
TO CHESNEE TELEPHONE COMPANY, INC., WEST CAROLINA RURAL TELEPHONE  
COOPERATIVE, AND LOCKHART TELEPHONE COMPANY**

Charter Fiberlink SC – CCO, LLC (“Charter Fiberlink”), by and through its undersigned attorneys, and pursuant to S.C. Code Ann. Regs. 103-851 and Rule 33 of the South Carolina Rules of Civil Procedure, propounds the following interrogatories to Chesnee Telephone Company, Inc. (“Chesnee”), West Carolina Rural Telephone Cooperative (“West Carolina”), and Lockhart Telephone Company, (“Lockhart”).

These interrogatories shall be answered under oath by you or your agent, who is qualified and who will be identified, with the answers being served within ten (10) days of service of these interrogatories. Each interrogatory shall be answered separately and fully in writing under oath unless it is objected to. Each answer shall be signed by the person making it.

Give the name, address and relationship to Chesnee, West Carolina, and Lockhart of those persons providing the answers to each of the following interrogatories.

### **Definitions**

1. The acronym "CLEC" refers to competitive local exchange carriers.
2. The acronym "CMRS" refers to commercial mobile radio service.
3. The acronym "ILEC" refers to an incumbent local exchange carrier as defined in 47 U.S.C. § 251(h).
4. The acronym "LERG" refers to the Local Exchange Routing Guide published by Telcordia Technologies, Inc.
5. The term "local dialing pattern" refers to dialing a telephone call using the same number of digits that are used for calls to telephone numbers within the originating rate center.
6. The terms "Chesnee," "West Carolina," and "Lockhart" mean Chesnee Telephone Company, Inc., West Carolina Rural Telephone Cooperative, and Lockhart Telephone Company.
7. The term "communication" includes, without limitation of its generality, correspondence, email, statements, agreements, contracts, reports, white papers, users' guides, job aids, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions and symposia, whether written or oral. The term includes, without limitation of its generality, both communications and statements which are face-to-face and those which are transmitted by

documents or by media such as intercoms, telephones, television, radio, electronic mail or the Internet.

8. The term “document,” as used herein, shall include, without limitation, all written, reported, recorded, magnetic, graphic, or photographic matter, however produced or reproduced, which is now, or was at any time, in the possession, custody, or control of your company and its affiliates including, but not limited to, all reports, memoranda, notes (including reports, memoranda, notes of telephone, email or oral conversations and conferences), financial reports, data records, letters, envelopes, telegrams, messages, electronic mail (e-mail), studies, analyses, books, articles, magazines, newspapers, booklets, circulars, bulletins, notices, instructions, accounts, pamphlets, pictures, films, maps, work papers, arithmetical computations, minutes of all communications of any type (including inter- and intra-office communications), purchase orders, invoices, statements of account, questionnaires, surveys, graphs, recordings, video or audio tapes, punch cards, magnetic tapes, discs, data cells, drums, printouts, records of any sort of meeting, invoices, diaries, and other data compilations from which information can be obtained, including drafts of the foregoing items and copies or reproductions of the foregoing upon which notations and writings have been made which do not appear on the originals.

9. The term “identify” or “identifying” means:

- a. When used in reference to **natural persons**: (1) full name; (2) last known address and telephone number; (3) whether the person is currently employed by, associated or affiliated with Chesnee, West Carolina, and Lockhart; (4) that person’s current or former position; and (5) dates of employment, association or affiliation.

- b. When used in reference to a **document**: (1) its author; (2) actual and intended recipient(s); (3) date of creation; and (4) brief description of its contents.
- c. When used in reference to a **communication**: (1) whether the communication was oral or written; (2) the identity of the communicator; (3) the person receiving the communication; and (4) the location of the communicator and the person receiving the information, if the communication was oral.
- d. When used in reference to a **trunk group**: (1) the end points of the trunk group, including the CLLI code and English language identifier for each such end point; (2) the V and H coordinates of each such end point; (3) the total capacity of the trunk group; (4) the airline distance between the end points of the trunk group; (5) whether the trunk group is a one-way or two-way trunk group; and (6) if the trunk group is a one-way trunk group, the directionality of such trunk group.

10. The terms “you,” “your,” “yours,” or “your company” mean Chesnee Telephone Company, Inc., West Carolina Rural Telephone Cooperative, and Lockhart Telephone Company and their officers, agents, attorneys, employees, representatives, agents, and consultants.

### **Interrogatories**

**Interrogatory No. 1:** Please refer to the document attached hereto as Exhibit A. Please summarize the terms and conditions (including, without limitation, rates and charges, if any) of the unexecuted agreement referred to in Exhibit A.

**Interrogatory No. 2:** Please state whether, as of the date of your response to these Interrogatories, you have executed the agreement referred to in Exhibit A.

**Interrogatory No. 3:** Please identify each and every trunk group directly connecting one of your end office switches to another end office or tandem switch owned or operated by you.

**Interrogatory No. 4:** Please identify each and every trunk group directly connecting one of your end office switches to an end office switch owned or operated by another telecommunications carrier.

**Interrogatory No. 5:** Please identify each and every trunk group directly connecting one of your end office switches to a tandem switch owned or operated by another telecommunications carrier.

**Interrogatory No. 6:** Please identify each and every trunk group directly connecting your tandem switch, if any, to a tandem switch owned or operated by another telecommunications carrier.

**Interrogatory No. 7:** For each trunk group identified in your responses to Interrogatories 3, 4, 5 and 6, please state whether, as of the date of your responses to these Interrogatories, one or more of your end office switches originates any calls dialed with a local dialing pattern over such trunk group that are sent directly or indirectly to NPA-NXX codes assigned to one or more rate centers to which your retail tariff provides for toll-free calling with a local dialing pattern.

**Interrogatory No. 8:** For each trunk group identified in your responses to Interrogatories 3, 4, 5 and 6, please state whether, as of the date of your responses to these Interrogatories, one or more of your end office switches receives any calls dialed with a local dialing pattern over such trunk group that are originated from NPA-NXX codes assigned to one or more rate centers from which the retail tariff of the ILEC providing local exchange service in such rate

center provides for toll-free calling with a local dialing pattern to one or more rate centers within which you provide local exchange service as an ILEC.

**Interrogatory No. 9:** For each trunk group identified in your responses to Interrogatories 3, 4, 5 and 6, please state whether it is technically feasible for one or more of your end office switches to originate calls dialed with a local dialing pattern over such trunk group that are sent directly or indirectly to NPA-NXX codes assigned to Charter Fiberlink that are associated in the LERG with one or more rate centers to which your retail tariff provides for toll-free calling with a local dialing pattern and, if so, identify the Charter Fiberlink NPA-NXX code(s) and the rate center(s) for which such call origination is technically feasible.

**Interrogatory No. 10:** For each trunk group identified in your responses to Interrogatories 3, 4, 5 and 6 with respect to which you contend that it is not technically feasible for you to originate calls dialed with a local dialing pattern over such trunk group that are sent directly or indirectly to one or more NPA-NXX codes assigned to Charter Fiberlink that are associated in the LERG with one or more rate centers to which your retail tariff provides for toll-free calling with a local dialing pattern, please identify the Charter Fiberlink NPA-NXX code(s) and the rate center(s) for which you contend such call origination is not technically feasible and state in detail why such call origination is not technically feasible.

**Interrogatory No. 11:** For each trunk group identified in your responses to Interrogatories 3, 4, 5 and 6, please state whether it is technically feasible for you to receive calls dialed with a local dialing pattern over such trunk group that are originated from NPA-NXX codes assigned to Charter Fiberlink that are associated in the LERG with one or more rate centers from which the retail tariff of the ILEC providing local exchange service in such rate center provides for toll-free calling with a local dialing pattern to one or more rate centers within

which you provide local exchange service as an ILEC and, if so, identify the Charter Fiberlink NPA-NXX code(s) and the rate center(s) for which your receipt of such calls is technically feasible.

**Interrogatory No. 12:** For each trunk group identified in your responses to Interrogatories 3, 4, 5 and 6 with respect to which you contend that it is not technically feasible for you to receive calls dialed with a local dialing pattern over such trunk group that are originated from NPA-NXX codes assigned to Charter Fiberlink that are associated in the LERG with one or more rate centers from which the retail tariff of the ILEC providing local exchange service in such rate center provides for toll-free calling with a local dialing pattern to one or more rate centers within which you provide local exchange service as an ILEC, please identify the Charter Fiberlink NPA-NXX code(s) and the rate center(s) for which you contend that your receipt of such calls is not technically feasible and state in detail why your receipt of such calls is not technically feasible.

**Interrogatory No. 13:** For each trunk group identified in your responses to Interrogatories 3, 4, 5 and 6, describe the nature and jurisdiction of the telecommunications traffic that is originated and terminated over such trunk group as of the date of your response to these Interrogatories.

**Interrogatory No. 14:** For each trunk group identified in your responses to Interrogatories 3, 4, 5 and 6, please identify each and every statute, regulation, contract, tariff or agreement that you contend restricts the nature or jurisdiction of the telecommunications traffic that may be originated or terminated over such trunk group and the nature of the restriction imposed by such statute, regulation, contract, tariff or agreement.



**Interrogatory No. 15:** Please summarize the terms and conditions (including, without limitation, rates and charges, if any) of each and every contract or agreement identified in your response to Interrogatory No. 14 that does not exist in written form.

s/ John J. Pringle, Jr.  
John J. Pringle, Jr., Esq.

ELLIS, LAWHORNE & SIMS, P.A.  
P.O. Box 2285  
Columbia, SC 29202  
(803) 779-0066

Charles A. Hudak, Esq.  
Norman B. Gerry, Esq.  
Charles V. Gerkin, Jr., Esq.

FRIEND, HUDAK & HARRIS, LLP  
Three Ravinia Drive, Suite 1450  
Atlanta, Georgia 30346-2131  
(770) 399-9500

ATTORNEYS FOR CHARTER FIBERLINK SC –  
CCO, LLC

July 17, 2006

# **Exhibit A**

Exhibit A to  
Charter Fiberlink's First Set of  
Interrogatories to Chesnee Telephone  
Company, Inc.

MARGARET M. FOX  
pfox@mcnair.net

BANK OF AMERICA TOWER  
1301 GERVAIS STREET  
COLUMBIA, SOUTH CAROLINA 29201

**MCNAIR LAW FIRM, P.A.**  
ATTORNEYS AND COUNSELORS AT LAW

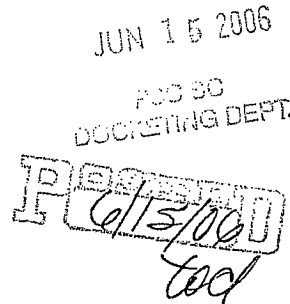
www.mcnair.net

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COLUMBIA, SOUTH CAROLINA 29211  
TELEPHONE (803) 799-9800  
FACSIMILE (803) 753-3219

180369  
S.A.

June 14, 2006

Mr. Charles L. A. Terreni  
Chief Clerk and Administrator  
South Carolina Public Service Commission  
Synergy Business Park, The Saluda Building  
101 Executive Center Drive  
Columbia, South Carolina 29210



SC  
PUBLIC  
SERVICE  
COMMISSION  
JUN 14 11 35 AM  
COLUMBIA

Re: **BellSouth Telecommunications, Inc. Transit Traffic Tariff 2005-50**  
**Docket No. 2005-63-C**

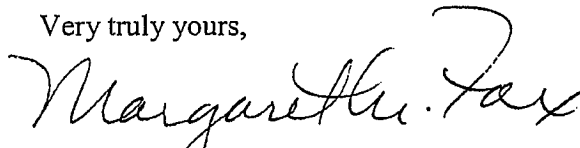
Dear Mr. Terreni:

By Order No. 2006-272, dated April 28, 2006, in the above-referenced docket, the Public Service Commission of South Carolina ("Commission") instructed BellSouth Telecommunications, Inc. ("BellSouth") and the South Carolina Telephone Coalition ("SCTC") to report on their progress in finalizing agreements regarding transit traffic. On May 30, 2006, Patrick Turner of BellSouth reported that BellSouth and SCTC's member companies had finalized the terms and conditions of agreements and that the parties anticipated completing the execution process within two weeks.

I am writing to inform the Commission that, while the execution process is in progress, it has not yet been completed. The final agreements have been prepared and distributed to the individual SCTC member companies. We expect to complete the execution process in the very near future.

SCTC and BellSouth will inform the Commission when that process is complete so that the Commission may take appropriate steps to close out this docket.

Very truly yours,

  
Margaret M. Fox

MMF/rwm

cc: Parties of Record

BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF  
SOUTH CAROLINA  
Docket No. 2005-63-C

IN RE:    BellSouth Telecommunications, Inc.        )  
          Transit Traffic Tariff                        )  
\_\_\_\_\_ )

**CERTIFICATE  
OF SERVICE**

This is to certify that I, Rebecca W. Martin, an employee with the McNair Law Firm, P. A., have this date served one (1) copy of the attached letter to the South Carolina Public Service Commission on behalf of the South Carolina Telephone Coalition in the above-referenced matter to the persons named below by causing said copies to be deposited with the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below.

Patrick W. Turner, Esquire  
BellSouth Telecommunications, Inc.  
Post Office Box 752  
Columbia, South Carolina 29202

Meredith E. Mays, Esquire  
BellSouth Telecommunications, Inc.  
675 West Peachtree Street, N. E.  
Atlanta, Georgia 30375

Benjamin Mustian, Esquire  
Office of Regulatory Staff  
Post Office Box 11263  
Columbia, South Carolina 29211

Bonnie D. Shealy, Esquire  
Robinson McFadden  
Post Office Box 944  
Columbia, South Carolina 29202

John J. Pringle, Jr., Esquire  
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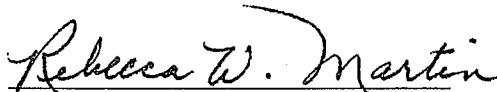
Gene V. Coker, Esquire  
AT&T – Law and Governmental Affairs  
1230 Peachtree Street, 4<sup>th</sup> Floor, Suite 4000  
Atlanta, Georgia 30309

Robert D. Coble, Esquire  
Nexsen, Pruet Adams Kleemeier, LLC  
Post Office Drawer 2426  
Columbia, South Carolina 29202-2426

Scott Elliott, Esquire  
Elliott & Elliott  
721 Olive Street  
Columbia, South Carolina 29205

William R. L. Atkinson, Esquire  
United Telephone & Sprint Communications  
3065 Cumberland Circle, Mailstop GAATLD0602-612  
Atlanta, Georgia 30339

M. Zel Gilbert  
Director of External Affairs – South Carolina  
Sprint  
1122 Lady Street, Suite 1050  
Columbia, South Carolina 29201

  
Rebecca W. Martin  
McNair Law Firm, P.A.  
Post Office Box 11390  
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June 14, 2006

Columbia, SC

Exhibit A to  
Charter Fiberlink's First Set of  
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Telephone Cooperative

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JUN 15 2006  
P.O. SC  
DOCKETING DEPT.  
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6/15/06  
too

2006 JUN 14 PM 3:56  
SCTC

Re: **BellSouth Telecommunications, Inc. Transit Traffic Tariff 2005-50**  
**Docket No. 2005-63-C**

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*Margaret M. Fox*  
Margaret M. Fox

MMF/rwm

cc: Parties of Record

ANDERSON • BLUFFTON • CHARLESTON • CHARLOTTE • COLUMBIA • GEORGETOWN • GREENVILLE • HILTON HEAD ISLAND • MYRTLE BEACH • RALEIGH

COLUMBIA 859979v1

BEFORE  
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Docket No. 2005-63-C

IN RE:    BellSouth Telecommunications, Inc.                    )  
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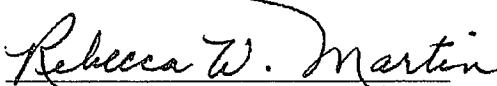
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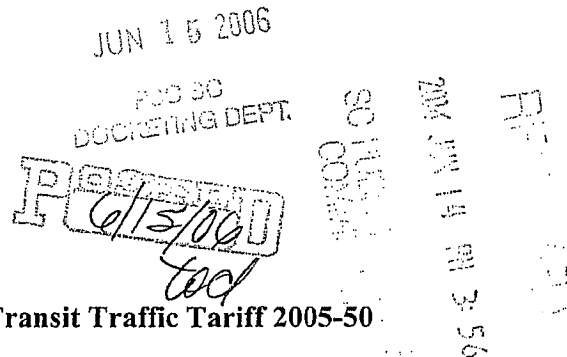
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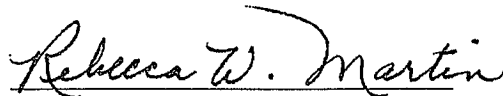
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June 14, 2006

Columbia, SC

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LLC for Arbitration of Certain Terms and	)	
Conditions of Proposed Agreement with	)	
West Carolina Rural Telephone Cooperative	)	Docket No. 2006-138-C
Concerning Interconnection under the	)	
Communications Act of 1934, as amended	)	
by the Telecommunications Act of 1996	)	

In Re:	)	
	)	
Petition of Charter Fiberlink SC – CCO,	)	
LLC for Arbitration of Certain Terms and	)	
Conditions of Proposed Agreement with	)	
Lockhart Telephone Company Concerning	)	Docket No. 2006-139-C
Interconnection under the Communications	)	
Act of 1934, as amended by the	)	
Telecommunications Act of 1996	)	

**CHARTER FIBERLINK SC – CCO, LLC’S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS  
TO CHESNEE TELEPHONE COMPANY, INC., WEST CAROLINA RURAL TELEPHONE  
COOPERATIVE, AND LOCKHART TELEPHONE COMPANY**

Charter Fiberlink SC – CCO, LLC (“Charter Fiberlink”), by and through its undersigned attorneys, and pursuant to S.C. Code Regs. 103-854 and Rule 34 of the South Carolina Rules of Civil Procedure, hereby serves the following Request for Production of Documents upon Chesnee

Telephone Company, Inc. ("Chesnee"), West Carolina Rural Telephone Cooperative ("West Carolina"), and Lockhart Telephone Company, ("Lockhart").

Please produce the following documents at the offices of Ellis, Lawhorne & Sims, P.A., 1501 Main Street, 5<sup>th</sup> Floor, Columbia SC 29201 no later than 30 days after service of this request for the purpose of inspection and copying.

### **Definitions**

1. The term "document," as used herein, shall include, without limitation, all written, reported, recorded, magnetic, graphic, or photographic matter, however produced or reproduced, which is now, or was at any time, in the possession, custody, or control of your company and its affiliates including, but not limited to, all reports, memoranda, notes (including reports, memoranda, notes of telephone, email or oral conversations and conferences), financial reports, data records, letters, envelopes, telegrams, messages, electronic mail (e-mail), studies, analyses, books, articles, magazines, newspapers, booklets, circulars, bulletins, notices, instructions, accounts, pamphlets, pictures, films, maps, work papers, arithmetical computations, minutes of all communications of any type (including inter- and intra-office communications), purchase orders, invoices, statements of account, questionnaires, surveys, graphs, recordings, video or audio tapes, punch cards, magnetic tapes, discs, data cells, drums, printouts, records of any sort of meeting, invoices, diaries, and other data compilations from which information can be obtained, including drafts of the foregoing items and copies or reproductions of the foregoing upon which notations and writings have been made which do not appear on the originals.

### **Documents Requested**

**Request No. 1:** Please provide all documents evidencing or memorializing any agreement between Chesnee, West Carolina, and Lockhart and BellSouth Telecommunications, Inc.

("BellSouth") concerning or relating to the transiting by BellSouth of local or intraLATA telecommunications traffic originated by Chesnee, West Carolina, and Lockhart for delivery by BellSouth to other telecommunications carriers.

**Request No. 2:** Please refer to Exhibit A hereto. If you have not done so in your response to Request No. 1, please provide the agreement referred to in Exhibit A that was distributed to Chesnee, West Carolina, and Lockhart for execution, whether or not such agreement has been executed by Chesnee, West Carolina, and Lockhart.

**Request No. 3:** Please provide each and every contract or agreement identified in your response to Interrogatory No. 14 that exists in written form.

s/ John J. Pringle, Jr.  
John J. Pringle, Jr., Esq.

ELLIS, LAWHORNE & SIMS, P.A.  
P.O. Box 2285  
Columbia, SC 29202  
(803) 779-0066

Charles A. Hudak, Esq.  
Norman B. Gerry, Esq.  
Charles V. Gerkin, Jr., Esq.

FRIEND, HUDAK & HARRIS, LLP  
Three Ravinia Drive, Suite 1450  
Atlanta, Georgia 30346-2131  
(770) 399-9500

ATTORNEYS FOR CHARTER FIBERLINK SC –  
CCO, LLC

July 17, 2006

# Exhibit A

Exhibit A to  
Charter Fiberlink's First Request for  
Production of Documents to Chesnee  
Telephone Company, Inc.

MARGARET M. FOX  
pfox@mcnair.net

BANK OF AMERICA TOWER  
1301 GERVAIS STREET  
COLUMBIA, SOUTH CAROLINA 29201

**MCNAIR LAW FIRM, P.A.**  
ATTORNEYS AND COUNSELORS AT LAW

www.mcnair.net

POST OFFICE BOX 11390  
COLUMBIA, SOUTH CAROLINA 29211  
TELEPHONE (803) 799-9800  
FACSIMILE (803) 753-3219

June 14, 2006

Mr. Charles L. A. Terreni  
Chief Clerk and Administrator  
South Carolina Public Service Commission  
Synergy Business Park, The Saluda Building  
101 Executive Center Drive  
Columbia, South Carolina 29210

Re: **BellSouth Telecommunications, Inc. Transit Traffic Tariff 2005-50**  
**Docket No. 2005-63-C**

Dear Mr. Terreni:

By Order No. 2006-272, dated April 28, 2006, in the above-referenced docket, the Public Service Commission of South Carolina ("Commission") instructed BellSouth Telecommunications, Inc. ("BellSouth") and the South Carolina Telephone Coalition ("SCTC") to report on their progress in finalizing agreements regarding transit traffic. On May 30, 2006, Patrick Turner of BellSouth reported that BellSouth and SCTC's member companies had finalized the terms and conditions of agreements and that the parties anticipated completing the execution process within two weeks.

I am writing to inform the Commission that, while the execution process is in progress, it has not yet been completed. The final agreements have been prepared and distributed to the individual SCTC member companies. We expect to complete the execution process in the very near future.

SCTC and BellSouth will inform the Commission when that process is complete so that the Commission may take appropriate steps to close out this docket.

Very truly yours,

*Margaret M. Fox*  
Margaret M. Fox

MMF/rwm

cc: Parties of Record



BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF  
SOUTH CAROLINA  
Docket No. 2005-63-C

IN RE:    BellSouth Telecommunications, Inc.                    )  
          Transit Traffic Tariff                                        )  
\_\_\_\_\_ )

**CERTIFICATE  
OF SERVICE**

This is to certify that I, Rebecca W. Martin, an employee with the McNair Law Firm, P. A., have this date served one (1) copy of the attached letter to the South Carolina Public Service Commission on behalf of the South Carolina Telephone Coalition in the above-referenced matter to the persons named below by causing said copies to be deposited with the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below.

Patrick W. Turner, Esquire  
BellSouth Telecommunications, Inc.  
Post Office Box 752  
Columbia, South Carolina 29202

Meredith E. Mays, Esquire  
BellSouth Telecommunications, Inc.  
675 West Peachtree Street, N. E.  
Atlanta, Georgia 30375

Benjamin Mustian, Esquire  
Office of Regulatory Staff  
Post Office Box 11263  
Columbia, South Carolina 29211

Bonnie D. Shealy, Esquire  
Robinson McFadden  
Post Office Box 944  
Columbia, South Carolina 29202

John J. Pringle, Jr., Esquire  
Ellis, Lawhorne & Sims, P. A.  
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Columbia, South Carolina 29202

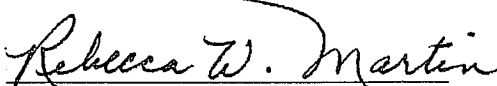
Gene V. Coker, Esquire  
AT&T – Law and Governmental Affairs  
1230 Peachtree Street, 4<sup>th</sup> Floor, Suite 4000  
Atlanta, Georgia 30309

Robert D. Coble, Esquire  
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M. Zel Gilbert  
Director of External Affairs – South Carolina  
Sprint  
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Columbia, South Carolina 29201

  
Rebecca W. Martin  
McNair Law Firm, P.A.  
Post Office Box 11390  
Columbia, South Carolina 29211  
(803) 799-9800

June 14, 2006

Columbia, SC

Exhibit A to  
Charter Fiberlink's First Request for  
Production of Documents to West  
Carolina Rural Telephone Cooperative

MARGARET M. FOX  
pfox@mcnair.net

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**MCNAIR LAW FIRM, P.A.**  
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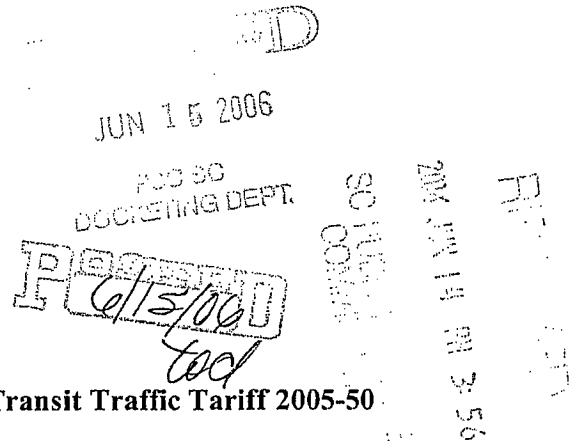
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180369  
S.A.

June 14, 2006

Mr. Charles L. A. Terreni  
Chief Clerk and Administrator  
South Carolina Public Service Commission  
Synergy Business Park, The Saluda Building  
101 Executive Center Drive  
Columbia, South Carolina 29210



**Re: BellSouth Telecommunications, Inc. Transit Traffic Tariff 2005-50  
Docket No. 2005-63-C**

Dear Mr. Terreni:

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Very truly yours,

*Margaret M. Fox*  
Margaret M. Fox

MMF/rwm

cc: Parties of Record

BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF  
SOUTH CAROLINA  
Docket No. 2005-63-C

IN RE:    BellSouth Telecommunications, Inc.                    )  
          Transit Traffic Tariff                                        )  
\_\_\_\_\_ )

**CERTIFICATE  
OF SERVICE**

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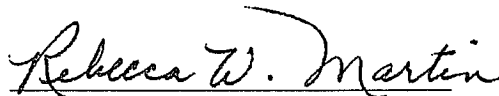
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Rebecca W. Martin  
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June 14, 2006

Columbia, SC

Exhibit A to  
Charter Fiberlink's First Request for  
Production of Documents to Lockhart  
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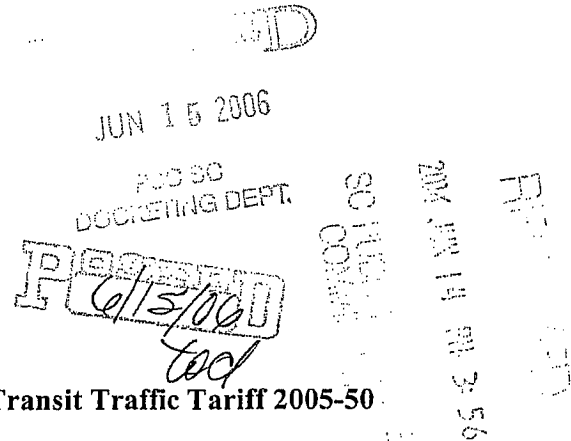
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Re: **BellSouth Telecommunications, Inc. Transit Traffic Tariff 2005-50**  
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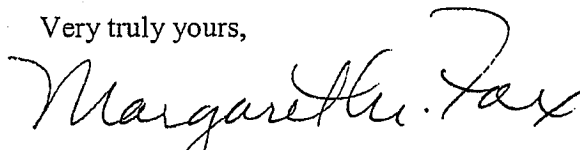
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Docket No. 2005-63-C

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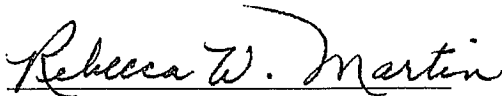
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(803) 799-9800

June 14, 2006

Columbia, SC



**BEFORE THE  
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

In Re:	)	
	)	
Petition of Charter Fiberlink SC – CCO,	)	
LLC for Arbitration of Certain Terms and	)	
Conditions of Proposed Agreement with	)	
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Petition of Charter Fiberlink SC – CCO,	)	
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Lockhart Telephone Company	)	Docket No. 2006-139-C
Concerning Interconnection under the	)	
Communications Act of 1934, as amended	)	
by the Telecommunications Act of 1996	)	

This is to certify that I have caused to be served this day, one (1) copy of Charter Fiberlink SC – CCO, LLC's First Set of Interrogatories and First Request for Production of Documents to Chesnee Telephone Company, Inc., West Carolina Rural Telephone Cooperative, and Lockhart Telephone Company via electronic mail and by placing a copy of same in the care and custody of the United States Postal Service (unless otherwise specified), with proper first-class postage affixed hereto and addressed as follows:

**VIA HAND-DELIVERY**

M. John Bowen, Esquire  
Margaret Fox, Esquire  
**McNair Law Firm, PA**  
1301 Gervais Street, 11<sup>th</sup> Floor  
Columbia SC 29201

The Honorable Charles L.A. Terreni  
Chief Clerk  
**South Carolina Public Service Commission**  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Joseph Melchers, Esquire  
Chief Counsel  
**South Carolina Public Service Commission**  
Post Office Drawer 11649  
Columbia, South Carolina 29211

C. Lessie Hammonds, Esquire  
Office of Regulatory Staff  
Legal Department  
PO Box 11263  
Columbia SC 29211

  
\_\_\_\_\_  
Carol Roof

July 17, 2006  
Columbia, South Carolina